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April 26, 2024

Via ECF

APPLICATION GRANTED  
SO ORDERED

The Honorable John G. Koeltl, U.S. District Judge  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007

  
4/28/24  
John G. Koeltl, U.S.D.J.

Re: ***NSI International, Inc. v. Horizon Group USA, Inc.,***  
**Docket No. 1:20-cv-08389 (S.D.N.Y. Oct. 07, 2020)**

Dear Judge Koeltl:

We represent Plaintiff NSI International, Inc. ("NSI") in the above-referenced matter. We write jointly on behalf of both parties to request an additional thirty (30) days, up to and including May 29, 2024, to finalize and execute the parties' settlement agreement and/or apply for the restoration of the action.

On February 26, 2024 the parties informed the Court by letter that they had reached a settlement in principle in this action, and were working to finalize and execute a settlement agreement. (ECF No. 93.) On February 27, 2024, in light of the parties' agreement regarding settlement, the Court ordered that this matter be discontinued, provided, however, that within 60 days of the Court's order (i.e., by April 29, 2024), counsel for NSI could apply by letter for restoration of the action to the Court's calendar. (ECF No. 94.)

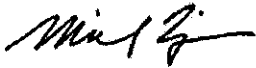
NSI submits this letter-motion on behalf of both parties to respectfully inform the Court that despite the diligent efforts of both parties, the parties have not yet finalized and consummated the final settlement agreement in this action. The parties anticipate that the settlement agreement will be fully executed within the next thirty (30) days. The parties therefore jointly request that the Court extend the date to file a motion to reopen for an additional thirty (30) days, up to and including May 29, 2024, in order to provide them with additional time to finalize the settlement agreement. This is the parties' first such request.

If Your Honor is not inclined to extend the date to file a motion to reopen the action, NSI respectfully requests by this letter that the Court restore the above-referenced case to the Court's calendar, pursuant to Your Honor's Order of February 27, 2024 (ECF No. 94).

The Honorable John G. Koeltl, U.S. District Judge  
April 26, 2024

The parties thank the Court for its consideration of this request.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Michael J. Zinna".

Michael J. Zinna

cc: All Counsel of Record